## **EXHIBIT F**

## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON

KATHERINE MOUSSOURIS, HOLLY	)
MUENCHOW, and DANA PIERMARINI,	)
on behalf of herself and a	)
class of those similarly situated,	)
Plaintiffs,	)
vs.	) No. 15-CV-1483(JLR)
MICROSOFT CORPORATION,	)
Defendant.	)
	_)

## CONFIDENTIAL

30(b)(6) DEPOSITION OF JOHN ADRIAN RITCHIE

VOLUME I

(Pages 1 through 279, Inclusive) JUNE 29, 2016

REPORTED BY: ROSALIE A. KRAMM, CSR NO. 3399, CRR

- 1 BY MS. GEMAN:
- 2 O. Yes.
- A. I would say there isn't.
- 4 O. So let's talk about them --
- 5 A. Can I make a distinction there?
- 6 O. Yes.

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- A. This would cover the prior 12 months. If -- assuming a person had been enrolled that long, and the current system covers the prior three or four months, however long it has been, and they are kind of reviewed.
  - Q. Yes, but I mean in the past if somebody had been employed long enough to be reviewed, they would still do a performance summary. So it would not necessarily be 12 months, there was no magic to 12 months in the old system, correct?
- MS. PERRY: Object to form.
- 17 BY MS. GEMAN:
- 18 O. Correct?
- 19 A. There was an eligibility requirement.
- Q. Right, but if you were eligible, even if you hadn't been employed the full 12 months, you would
- 22 complete the performance summary, correct?
- MS. PERRY: Object to form.
- THE WITNESS: That's the required process, yes.
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1 BY MS. GEMAN:
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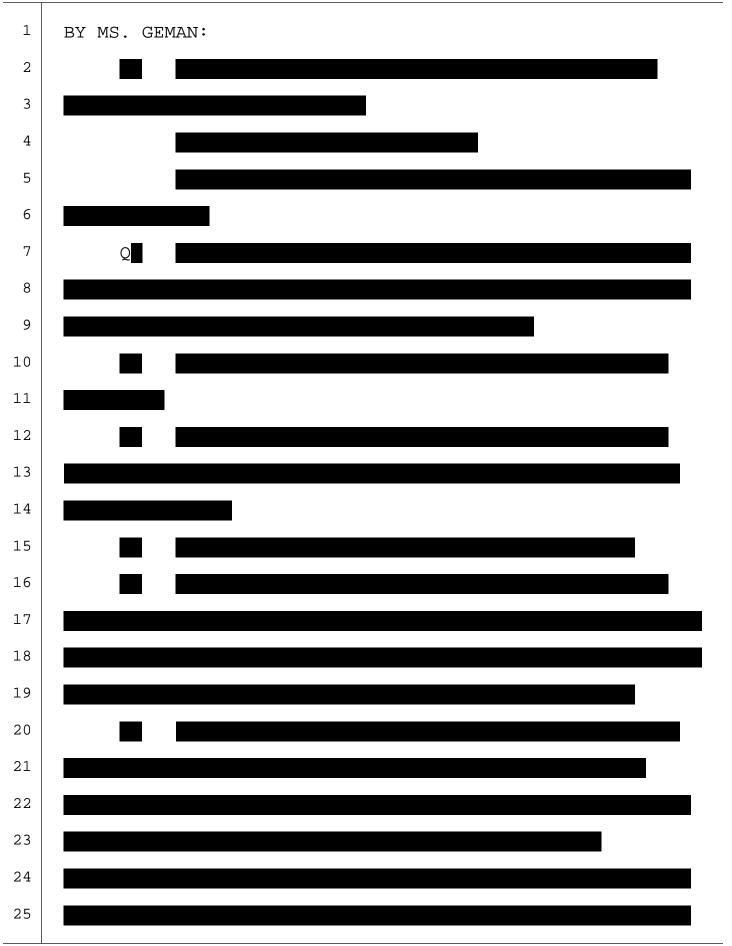
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- Q. In terms of the managers making a recommended rating, can we discuss what training -- and now I'm talking about the period 2010 through 2014. I understand there was a change in that time to what the specific rating was, but in that time period the managers gave ratings every year, correct?
  - MS. PERRY: Object to form.
- 9 THE WITNESS: You said 2010 to 2014?
- 10 BY MS. GEMAN:
- 11 Q. Yes.
- 12 A. And no, that's not correct.
- 13 Q. Are you saying 2013?
- 14 A. Yes.
- Q. So focusing on that time period, managers gave ratings, correct?
- A. Managers made an initial recommendation on what they thought a performance rating should be.
- Q. And just a question about the 1 to 5 rating, at any point was 5 the best versus the worst?
  - A. Yes. Not in this period of time.
- Q. What period of time was that in?
- 23 A. Pre 2006.
- Q. And what -- in the period 2010 to 2013, did
  managers have yearly trainings on how to assign a rating?

- MS. PERRY: Object to form.
- THE WITNESS: There was training available, and
- 3 there were resources available.
- 4 BY MS. GEMAN:
- Q. Was there any required training? Any -- I'm
- 6 sorry.
- 7 | Was there any required training that managers
- 8 had to take?
- 9 MS. PERRY: Object to form.
- 10 BY MS. GEMAN:
- 11 Q. In connection with assigning an initial rating?
- MS. PERRY: Same objection.
- THE WITNESS: What do you mean by "training"?
- 14 BY MS. GEMAN:
- 15 Q. Well, you just answered there was training
- 16 | available. What I'm asking is, was there any that was
- 17 required?
- 18 A. No.
- 0. The -- and the -- could you characterize the --
- what was available for managers, just so we have the
- 21 names of the documents?
- MS. PERRY: Object to form. You are asking him
- what training resources were available to managers for
- 24 | the system for 2011, 2012, and 2013?
- MS. GEMAN: No. That is not what I was asking.



BY MS. GEMAN:

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18 Q.

20 A.

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- Q. So in the peoples discussion that occurs -- strike that.
  - Is it the case that the direct managers give a suggested impact to separate personnel who are involved in the end-of-year person discussion?
    - MS. PERRY: Object to form.
- 7 THE WITNESS: Can you repeat that?
- 8 BY MS. GEMAN:

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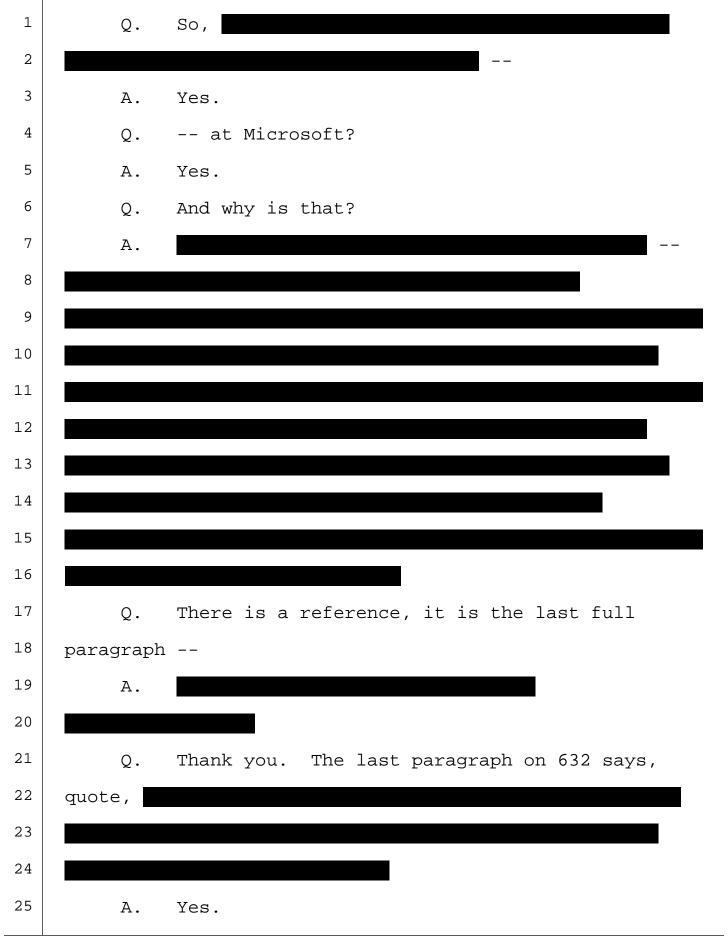
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- Q. Yes. So in the old system the direct manager would not be in the calibration meeting for the employee he rated or she rated, correct?
- 12 A. Yeah, got it.
- Q. And instead the direct manager would assign a ranking or rating and have a performance summary, and that would be included in the calibration meetings, correct?
- MS. PERRY: Object to form.
  - THE WITNESS: So the calibration -- in the old system, there was a direct manager who might not be in a calibration meeting. Right? And so they would have prepared information to share with their manager who we would call the calibration manager who is actually in the meeting, okay.
- 24 BY MS. GEMAN:
- Q. Not just might not be, was not in the meeting,



- Q. Do you know what the 1, 2, 3 Performance Rating is?
  - A. Now this tells me we're in the 2011 to 2013 period.
    - Q. How do you know that?
  - A. Because the performance rating -- the 1, 2, 3

    Performance -- this is the ratings we used at that time.

    So our best performers -- all other things being equal,

    best performers get increases larger than the level

    below, the level below, and the level below.
  - Q. And since 2013, the system changed in determining merit increases?
  - A. The fundamental principle of looking at performance impact, performance or impact and position in salary range has not changed, the fundamental approach.
  - Q. So higher performing employees receive more -- or higher merit increase generally?
    - A. Yes, all other things being equal.
    - Q. And that's --
      - A.

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Q. Previously we had talked about setting starting

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    salary for a new hire. Are you familiar with the term
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     "level" at Microsoft?
 3
          Α.
               I am.
 4
          Ο.
               And are you familiar with how levels are set
5
    for particular incoming or new hires at Microsoft?
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               MS. PERRY: Object to form.
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               THE WITNESS: Can you be more specific?
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    BY MR. KLEIN:
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          Ο.
               Well, again, if somebody was hired at
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    Microsoft, how would you know, or how would Microsoft
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    know what level that person should be set at?
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          Α.
               Well, the individual would be hired into a
13
    specific job, and that job is going to have a level
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    associated with it.
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          Ο.
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                            Object to form.
               MS. PERRY:
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               THE WITNESS:
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    BY MR. KLEIN:
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          Ο.
               Yes.
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          Α.
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          Ο.
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	REPORTER'S CERTIFICATE
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3	I, Rosalie A. Kramm, Certified Shorthand
4	Reporter for the State of Washington, do hereby certify:
5	That the witness named in the foregoing
6	deposition was by me duly sworn; that the deposition was
7	then taken before me at the time and place herein set
8	forth; that the testimony and proceedings were reported
9	stenographically by me and were transcribed through
10	computerized transcription by me; that the foregoing is a
11	true record of the testimony and proceedings taken at
12	that time; and that I am not interested in the event of
13	the action.
14	Witness my hand dated July 9, 2016.
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18	ROSALIE A. KRAMM
19	WA CSR 3399, RPR, CRR
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